

Exhibit G

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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SCANVINSKI JEROME HYMES,

Plaintiff,

vs.

Case No. 3:16-cv-04288-JSC

MILTON BLISS, VICTOR M. SANCHEZ,
JOSEPH A. LEONARDINI, SCOTT NEU,
EUGENE A. JONES, PAUL TIMPANO,
PIERRE A. GRAY,

Defendants.

_____ /

VIDEOTAPED DEPOSITION OF SCOTT NEU

Thursday, August 9, 2018

NONCONFIDENTIAL TRANSCRIPT

Pages 1-42; 44-59; 63-94

CLARK REPORTING & VIDEO CONFERENCING

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REPORTED BY:

SANDRA L. CARRANZA, CRR, RPR, CSR 7062

I N D E X

DEPOSITION OF SCOTT NEU

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SCOTT NEU

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10:14 1 A. I believe a day or two before supervisory
2 staff came into muster and they let us know that an
3 inmate named Scavinski Hymes would be coming to be
4 housed at the jail. They also mentioned that he was
10:15 5 on the show MSNBC San Quentin's Most Violent Inmates
6 TV show. They didn't show the video but they did
7 suggest that we do some due diligence and look at
8 the video so we understand who we have coming up for
9 the jail. And they also mentioned that he had the
10:15 10 most violations for violent offenses in the
11 California Penal Code system -- prison system.

12 Q. Could you say that last thing one more
13 time, "most" ...

14 A. Violent offenses in the California prison
10:15 15 system.

16 Q. Do you remember anything else that you were
17 told about Mr. Hymes?

18 MS. ROSENBLIT: Objection. Vague as to
19 time.

10:15 20 MR. KATON: Q. At that muster that you
21 were talking about.

22 A. No.

23 Q. Did you in fact do any due diligence to
24 look further into Mr. Hymes' background?

10:16 25 A. I did.

SCOTT NEU

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10:16 1 Q. What did you -- what did you do?

2 A. I ran a Google search for his name. I saw
3 the video in question and watched the entirety of
4 the show.

10:16 5 Q. Anything else?

6 A. I also noticed he had a Facebook page up at
7 that time.

8 Q. Anything you remember about the Facebook
9 page?

10:16 10 A. I remember there were some entries that
11 someone put in there about him getting paid for the
12 show, something to do with monetary dollar amount
13 for being on the show, but otherwise, no.

14 Q. Is there anything else that you came across
10:16 15 in your due diligence?

16 A. That was it.

17 Q. And who -- if you remember, who was it who
18 provided you with this information about Mr. Hymes
19 coming to the jail and suggesting that deputies do
10:17 20 some due diligence?

21 A. It was supervisory staff. I don't remember
22 exactly who it was.

23 Q. And is your best estimation of when that
24 meeting took place, I think you said one or two days
10:17 25 before the 24th of July?

1 REPORTER CERTIFICATE

2 I, the undersigned, a Certified Shorthand
3 Reporter of the State of California, do hereby
4 certify: That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were duly sworn; that a record
8 of the proceedings was made by me using machine
9 shorthand which was thereafter transcribed under my
10 direction; that the foregoing transcript is a true
11 record of the testimony given.

12 Further, that if the foregoing pertains to
13 the original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [] was [X] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date subscribed my
20 name.

21 Dated: August 13, 2018

22 _____
23 SANDRA L. CARRANZA
24 CSR No. 7062
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